

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.

Tyshia Ree Coleman

Case No. Case: 2:21-mj-30378  
Assigned To : Unassigned  
Assign. Date : 8/5/2021  
SEALED MATTER (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 4/13/20 to 1/26/21 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 1349

Conspiracy to Commit Wire Fraud

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: August 5, 2021

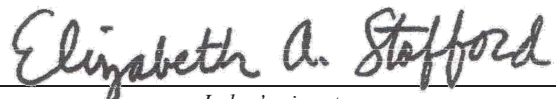
City and state: Detroit, MI



*Complainant's signature*

Jeffrey Weiland- Special Agent

*Printed name and title*



*Judge's signature*

Elizabeth A. Stafford- U.S Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Jeffrey Weiland, being duly sworn, states as follows:

**YOUR AFFIANT'S BACKGROUND, TRAINING AND EXPERIENCE**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since September 2007. I am currently assigned to the Public Corruption and Government Fraud squad in the Detroit Division of the FBI. As a Special Agent, I have investigated crimes including the corruption of state and local officials, arson, forced labor trafficking, racketeering and violations of the Foreign Agents Registration Act. During these investigations, I have been the affiant on search warrants for businesses, residences and electronic mail (e-mail) accounts. I have also conducted investigations using consensual recordings, undercover operations, Title III wiretaps and techniques authorized under the Foreign Intelligence Surveillance Act (FISA).

**PURPOSE OF AFFIDAVIT**

2. This affidavit is submitted in support of a criminal complaint for Tyshia Ree COLEMAN, date of birth 10/XX/1983, for violating 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud). Based on the facts set forth in this affidavit, there is probable cause to believe that COLEMAN conspired, or agreed, to commit the crime of wire fraud, and other federal crimes, with Sharodney Marteze

Harrison (“Sharodney”). Furthermore, COLEMAN knowingly and voluntarily joined the conspiracy.

3. The information contained in this affidavit is based upon my personal knowledge obtained through participating in this investigation as well as information I received from the Michigan Unemployment Insurance Agency (MUIA), U.S. Department of Labor, Federal Grand Jury subpoenas, court orders issued pursuant to 18 U.S.C. § 2703(d), search warrants and interviews.

4. Since this affidavit is being submitted for the limited purpose of establishing probable cause that COLEMAN violated 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud), I have not included each and every fact known to me concerning this investigation.

### **BACKGROUND ON INVESTIGATION**

5. The FBI and Department of Labor-Office of Inspector General (DOL-OIG) are investigating COLEMAN, Sharodney and other individuals known and unknown for defrauding the State of Michigan and other states out of federal dollars earmarked for Pandemic Unemployment Assistance (PUA). The investigation began with a focus on more than one hundred claims for Unemployment Insurance (UI) that had been filed with the State of Michigan from two Internet Protocol (IP) addresses - 68.34.90.152, assigned to XX46 Quinn Street Lowr, Detroit, Michigan 48234 and 68.42.157.111 assigned to XX203 Steel

Street, Detroit, Michigan 48235. Sharodney resides at XX46 Quinn Street.

6. On January 26, 2021, agents from the FBI and DOL-OIG executed search warrants at XX46 Quinn Street, the residence of Sharodney, and XX203 Steel Street, the residence of Seandrea Crawford. Agents found paper and electronic evidence of UI fraud at both locations, including text messages between RANDALL and Sharodney in furtherance of their conspiracy to commit wire fraud. On January 26, 2021, agents also interviewed COLEMAN and other persons believed to have knowledge of the fraud scheme.

### **PROBABLE CAUSE**

#### **A. Background on Unemployment Insurance Program**

7. The Social Security Act of 1935 initiated the federal and state UI system. The system provides benefits to individuals who are unemployed for reasons beyond their control. The purpose of the UI system is twofold: first, to lessen the effects of unemployment through cash payments made directly to laid-off workers, and second, to ensure that life necessities are met on a weekly basis while the worker seeks employment. In Michigan, the UI system is administered by the MUIA, which is part of the Michigan's Department of Labor and Economic Opportunity. Other States administer their UI programs through similar state run agencies. Regardless of state, the U.S. Department of Labor funds each of the respective state agency's administrative costs, including salaries, office expenses,

and computer equipment.

8. State unemployment systems and benefits are largely financed by taxes on private employers located in that state. When state unemployment benefits are exhausted, they may be supplemented by federal funds appropriated by the U.S. Department of Labor.

9. As of the time of this application, the federal government is providing significant supplemental benefits to the states as a result of the COVID-19 pandemic. Beginning in or about March 2020 and continuing through the present, the Families First Coronavirus Response Act (FFCRA); Coronavirus Aid, Relief, and Economic Security (CARES) Act; and American Rescue Plan Act of 2021 (ARPA) have created federal programs that allowed for the significant outlay of federal funds flowing to and through the states to offset the historic needs for unemployment benefits by the American workforce, including the State of Michigan and in the Eastern District of Michigan. Collective, these benefits are often referred to as Pandemic Unemployment Assistance (PUA).

10. Normally, in the absence of fraud, an unemployed worker initiates an UI claim in person, over the telephone, or on the Internet. Currently, the overwhelming majority of UI claims are filed online through a state website. In order to be eligible for UI benefits, the worker must demonstrate a certain level of earnings in several quarters immediately preceding the application. The amount of

unemployment benefits that a UI claimant might be eligible for depends on a variety of factors, including but not limited to the length of his or her previous employment and the amount of wages he or she earned.

11. The state agency will either approve or reject a UI claim based on the application made by the unemployed worker. If the state agency approves a UI claim, the claimant is required to re-certify the claim via telephone or Internet at various times during the life of the claim. The worker must also certify that he or she is still unemployed and actively seeking work. One way in which unemployment benefits are provided to a claimant is through the use of a debit card, issued by the Bank of America (BOA) in Michigan, which is mailed to the claimant through the U.S. Postal Service. The unemployment benefits are loaded onto the debit card electronically. Alternatively, a worker can provide the state agency with a bank routing number and bank account in which to have their unemployment benefits directly deposited electronically. In either case, additional benefits are loaded electronically at intervals thereafter. The Bank of America centers used to process Michigan's UI claims are located in Virginia and Texas.

12. In an effort to prevent and otherwise inhibit fraud, the state agencies capture certain data surrounding the interaction between an individual and the UI system. Each time a claim is accessed in the system, it creates a digital footprint of sorts. Although states utilize their own unique systems, many times the data that is

collected includes the dates, times, Internet Protocol (IP) address, and Media Access Control (MAC) address associated with a device accessing a claim. The state systems tie this information to the user-entered information captured to facilitate the claim (i.e. name, address, social security number, BOA or other bank account numbers, bank routing numbers, etc.). It is through the analysis of this data that the state agencies and investigating agents can identify fraudulent trends and tendencies associated with certain claims.

**B. Search Warrants Executed at XX46 Quinn Street and XX203 Steel Street**

13. On January 26, 2021, the FBI and DOL-OIG executed search warrants at XX46 Quinn Street and XX203 Steel Street. Agents found paper and electronic evidence of UI fraud at XX203 Steel Street. At XX46 Quinn Street, agents seized debit cards and UI claims information in the name of more than twenty-five people. Agents also seized four cellular telephones and a laptop computer. During a voluntary interview with agents, Sharodney admitted a number of facts regarding his scheme to file false UI claims. Sharodney admitted that he used people's personal information to file claims without their knowledge or consent. Sharodney admitted that he paid people to have UI claims and debit cards sent to their homes. Sharodney, however, would not identify other participants in the scheme.

14. Evidence collected in this investigation, including text messages

found on Sharodney's cellular telephones, shows that in order to facilitate and conceal the UI fraud, Sharodney worked with other individuals including COLEMAN. Among the actions taken by those individuals to further the goals of the conspiracy were: (1) creating e-mail accounts to link with UI claims, (2) submitting UI claims, (3) re-certifying the UI claims, (4) using their telephone numbers to verify identity, (5) creating online bank accounts in which the UI benefits were deposited, (6) collecting mail for the UI claims and (7) collecting mail with pre-paid cards on which UI benefits had been deposited.

**C. Tyshia Ree COLEMAN**

15. Agents reviewed three of Sharodney's cellular telephones seized from XX46 Quinn Street. Sharodney had messages on his cellphones from telephone numbers 313-XXX-4042 and 313-XXX-1380. In his contacts, Sharodney identified 313-XXX-4042 and 313-XXX-1380 as belonging to Tammy. During a voluntary interview on January 26, 2021, COLEMAN stated that she previously used telephone number 313-XXX-4042.

16. On 05/14/2020, COLEMAN texted Sharodney an image of a Green Dot account ending in -7612. On 05/18/2020, Michigan UI claims in the names of four individuals unrelated to COLEMAN were deposited in the Green Dot account ending in -7612.

17. On 05/18/2020, COLEMAN and Sharodney exchanged text messages:



Sharodney: Login to that green dot account an see how much on there

Tammy: [image of Green Dot card with \$19,520.00 balance]

Tammy: Dont forget i want u to order them yeezys for me size 6

Sharodney: Gurl worry bout that once u bring me that card

Tammy: Boy u get that ugly ass card u can having already on the way

Sharodney: Just want I said ok dam an text me ur address so I can send sum cards to ur crib imam give 500 off use card

Sharodney: An the 19bandz u got 3bandz coming off that

Tammy: 5591 buckingham 48224

Sharodney: Ok

Each of the four UI claims deposited in COLEMAN's Green Dot account on 05/18/2020 were for \$4,880, thus totaling \$19,520. I believe Sharodney was stating that he would pay COLEMAN \$3,000 for collecting the cards and setting up the Green Dot account. I believe COLEMAN knew that the UI benefits being deposited in the Green Dot account were from fraudulent claims.

18. On 05/23/2020, COLEMAN and Sharodney exchanged text messages:

Sharodney: Ok bet I got more cards cumin there to bby we gone eat good

Sharodney: [image of an envelope] They gone look like this

Tammy: Ok cool

Tammy: Wya baby it came

...

Sharodney: Did you activate it

Sharodney: Text me username an password baby

Tammy: Tyshia1013. Cherry 12

Sharodney was telling COLEMAN that he was expecting more prepaid debit cards to arrive at her house. When the cards arrived, I believe that COLEMAN contacted Sharodney and activated them so that the funds from fraudulent UI claims could be accessed.

19. On 07/01/2020, COLEMAN and Sharodney exchanged text messages:

Sharodney: Send me that code fat gurl

Tammy: I thought u said u was gone look out for me when u load the other one again

Sharodney: U got the password to the Greendot baby ain't shit loaded since the first time I'm trying to in a different stat now just chill

I believe Sharodney is asking for an authentication code for an e-mail or bank account which would have been sent to COLEMAN. Sharodney needed access to the account in order to file fraudulent claims in a different state. I believe COLEMAN then asked for money when she wrote "u was gone look out for me." Sharodney responded that no more money had been deposited in the account so he was not going to pay her again until more money was paid out on the fraudulent UI claims. Sharodney wrote that COLEMAN could verify that no more funds had

been deposited because she had the password to the Green Dot account.

20. On 07/19/2020, COLEMAN and Sharodney exchanged text messages:

Tammy: Call me tmrw some mail came this Tammy

Sharodney: Ok send me a picture of it

Tammy: [image of four unopened letters from Pennsylvania Office of Unemployment Compensation addressed to 5591 Buckingham Avenue, Detroit, MI 48224 in the names of EA, CK, RE and AT]

The four names listed on the envelopes had nine total UI claims filed in Michigan and California in addition to Pennsylvania. Of those nine claims, four were filed from Sharodney's IP address and four listed Sharodney's telephone number as the claimant's telephone number.

21. On 09/05/2020, COLEMAN texted Sharodney an image of an unopened letter from the California Employment Development Department addressed to 5591 Buckingham Avenue, Detroit, Michigan 48224 in the name of another person with the message "card." On 09/06/2020, Sharodney texted COLEMAN "Once I swipe the card a couple times u get another band bby." I believe Sharodney was telling COLEMAN that after he withdrew cash for the account then he would give her another \$1,000 from the fraudulently obtained UI funds.

22. During her interview on 01/26/2021, FBI Agents asked COLEMAN if she knew anything about Sharodney filing for unemployment benefits and,

specifically, whether he had asked her to do anything. COLEMAN answered no.

23. Forty-two UI claims filed between 04/13/2020 and 08/06/2020 listed 5591 Buckingham Avenue, Detroit MI 48224 as the mailing address. The claims were filed in California, Michigan, Pennsylvania and Montana.

24. As to claims filed with the State of Michigan and California, all payments are processed through Bank of America centers located in Virginia and Texas. It is believed that the servers used to process UI claims in Pennsylvania and Montana are not located in Michigan. Thus, when receiving payments on Michigan UI claims and when filing claims in other states, I believe that COLEMAN or Sharodney used wire communications or caused another to use wire communications in interstate commerce in furtherance of the scheme.

### **CONCLUSION**

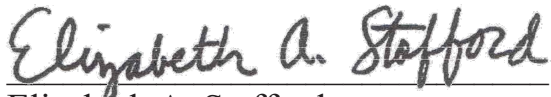
25. Based on the foregoing information, there is probable cause to believe that COLEMAN conspired, or agreed, to commit the crime of wire fraud and that COLEMAN knowingly and voluntarily joined the conspiracy. Therefore, there is probable cause to believe that COLEMAN violated 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud).



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Special Agent Jeffrey Weiland  
Federal Bureau of Investigation

Subscribed and sworn to before me  
or by reliable electronic means  
this 5th day of August, 2021:



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Elizabeth A. Stafford  
United States Magistrate Judge